

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
EAGLE PIPE, LLC, ¹	§	Chapter 11 (MI)
Debtor.	§	Case No. 20-34879-11
	§	

NOTICE OF PROPOSED FURTHER REVISED SALE ORDER

PLEASE TAKE NOTICE that on October 9, 2020, the Debtor filed its *Motion for (I) an Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling Bid Deadline, Auction Date, and Sale Hearing and Approving Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; and (II) an Order Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of Liens, Claims and Interests* [Docket No. 55] (the “Sale Motion”).

PLEASE TAKE FURTHER NOTICE that on November 18, 2020, the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Bankruptcy Court”) entered its *Amended Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling Bid Deadline, Auction Date, and Sale Hearing and Approving Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof* [Docket No. 151] (the “Bidding Procedures Order”) approving certain bidding procedures.

PLEASE TAKE FURTHER NOTICE that an Auction was held on November 20-23, 2020, using a secure web-based video teleconferencing deposition service and telephone.

PLEASE TAKE FURTHER NOTICE that the Debtor is seeking approval of the Successful Bid at an electronic hearing scheduled to commence **November 30, 2020 at 9:00 a.m. (prevailing Central Time)** (the “Sale Hearing”) before the Honorable Marvin Isgur, United States Bankruptcy Judge for the Bankruptcy Court for the Southern District of Texas, at 515 Rusk Street, 4th Floor, Courtroom No. 404, Houston, Texas 77002.

PLEASE TAKE FURTHER NOTICE that Debtor has attached herein **Exhibit A**, the Proposed Revised Sale Order (“Revised Sale Order”) and a redline copy against the proposed order filed on November 25, 2020 [Docket No. 170] attached herein as **Exhibit B**. Cumulative redlines against the order attached to the original motion [Docket 55] are attached as **Exhibit C**.

[Remainder of page intentionally left blank]

¹ The last four digits of Debtor’s federal tax identification number are (1119).

Respectfully submitted this 29th day of November, 2020.

GRAY REED

By: /s/ Aaron M. Kaufman

Paul D. Moak

Texas Bar No. 00794316

Aaron M. Kaufman

Texas Bar No. 24060067

Lydia R. Webb

Texas Bar No. 24083758

1300 Post Oak Blvd., Suite 2000

Houston, Texas 77056

Telephone: (713) 986-7000

Facsimile: (713) 986-7100

Email: pmoak@grayreed.com
akaufman@grayreed.com
lwebb@grayreed.com

PROPOSED COUNSEL TO THE DEBTOR

CERTIFICATE OF SERVICE

I certify that on November 29, 2020, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron M. Kaufman

Aaron M. Kaufman